

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

*In re: Clearview AI, Inc. Consumer Privacy  
Litigation*

Civil Action File No.: 1:21-cv-00135

Judge Sharon Johnson Coleman

Magistrate Judge Maria Valdez

**JOINT STATUS REPORT  
AND REQUEST TO SET STATUS HEARING ON SETTLEMENT**

Plaintiffs; Defendants Clearview AI, Inc. (“Clearview”), Hoan Ton-That, Richard Schwartz, Rocky Mountain Data Analytics LLC (“Rocky Mountain”), and Thomas Mulcaire (collectively, the “Clearview Defendants”); and Defendants Macy’s, Inc., Macy’s Retail holdings, Inc. (n/k/a Macy’s Retail Holdings, LLC), and Macy’s Corporate Services, Inc (n/k/a Macy’s Corporate Services, LLC) (collectively, the “Macy’s Defendants”), by and through their respective counsel, jointly submit the following Status Report:

Interim Lead Class Counsel and Counsel for the Clearview Defendants have previously reported that with the assistance of mediator Hon. Wayne Andersen (ret.), they have been working to finalize a term sheet laying out the terms for a resolution of this matter. Those conversations have now been completed and a Settlement Framework Agreement (“SFA”) that will guide the drafting of the definitive documentation has been completed and signed by Interim Lead Class Counsel and by Counsel for the Clearview Defendants (hereinafter, the “Settlement Parties”).

The Settlement Parties request that the Court suspend all discovery and any other deadline so that they can complete the extensive documentation required to complete the agreement contemplated by the SFA, which will, of course, require this Court’s approval. The Settlement

Parties request that the Court set the matter for status in late September, 2023 on a date convenient to the Court, when the Settlement Parties expect to be able to present a schedule for preliminary approval, class notice, etc.

Dated: September 6, 2023

Respectfully submitted:

By: /s/ Jon Loevy  
JON LOEVY

*Plaintiffs' interim lead class counsel*

By: /s/ Daniel R. Saeedi  
DANIEL R. SAEEDI

*Counsel for the Macy's Defendants*

By: /s/ James Thompson  
JAMES THOMPSON

*Counsel for the Clearview Defendants*

Counsel for Other Plaintiffs:

Frank Hedin  
Joshua Arisohn  
Scott Drury  
Steven Webster  
Michael Drew  
Michael Wood

**CERTIFICATE OF SERVICE**

I, James Thompson, an attorney, hereby certify that, on September 6, 2023, I caused to be filed the foregoing document using the Court's CM/ECF system, which effected service on all counsel of record.

/s/ James Thompson  
James Thompson